

[Parties and Counsel Listed on Signature Pages]

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

MDL No. 3047

Case No. 4:22-md-03047-YGR (PHK)

This Document Relates To:

*DeKalb County School District v. Meta Platforms,
Inc., et al.*

Case No. 4:25-cv-02310-YGR

**ERRATA TO DECLARATION OF
DAVIS VAUGHN IN SUPPORT OF
PLAINTIFF DEKALB COUNTY
SCHOOL DISTRICT'S OPPOSITION TO
DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT**

Judge: Hon. Yvonne Gonzalez Rogers
Magistrate Judge: Hon. Peter H. Kang

1 I, Davis Vaughn, declare under penalty of perjury:

2 1. I am an attorney duly admitted to practice law in Alabama and admitted *pro hac vice* in
3 this Court. I am a Principal with the Beasley Allen Law firm and am counsel for Plaintiff DeKalb
4 County School District. I have personal knowledge of the facts stated in this Declaration, and if
5 called upon to do so, could and would competently testify thereto.
6

7 2. I am providing this Declaration to correct an error regarding one exhibit that was
8 mistakenly filed in support of DeKalb County School District's Opposition to Defendants' Motion
9 for Summary Judgment (SD MSJ No. 5).
10

11 3. Upon review of Defendants' reply brief, I have discovered that the exhibit filed was not
12 the correct document intended for submission. The mistakenly filed exhibit (affidavit of Monika
13 Davis) was identified as Exhibit 12 in DeKalb's Opposition to Defendants' Motion for Summary
14 Judgment (SD MSJ No. 5), which was not the version intended to accompany the filing.

15 4. Defendants' Motion for Summary Judgment (DeKalb)(SD MSJ No. 5) Exhibit FF is the
16 correct version, which accurately reflects the information and documentation intended for
17 submission. The previously filed exhibit should be disregarded and replaced with the Ex. FF of
18 Defendants' Motion for Summary Judgment (DeKalb)(SD MSJ No. 5).
19

20 5. I declare under penalty of perjury under the laws of the United States that the foregoing is
21 true and accurate.
22

23 DATED: January 14, 2026

BY: /s/ Davis Vaughn

24 Davis Vaughn
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26 PORTIS & MILES, P.C.
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28 Montgomery, AL 36103
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served via electronic mail on January 14, 2026, to Counsel for Defendants:

MetaNoticeofService@cov.com

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BY: /s/ Davis Vaughn
Davis Vaughn